

1 while.

2 Q What do you know about that?

3 A Just what I read in the paper. I think it
4 was a recent article that said she was barred
5 from Suffolk County and then worked for CMS
6 at another facility and then stopped doing
7 so.

8 Q Do you know if she was offered any other
9 positions within CMS when she was terminated?

10 MS. CAULO: Objection.

11 A I don't know.

12 Q You don't anything about how CMS treated
13 Mrs. Porter other than what you read in the
14 paper?

15 A Correct.

16 Q How do CMS employees gain access to the
17 prison after they're given work there?

18 A They're given a contractor ID, which is -- I
19 have a department ID here, which has my
20 picture in white. The contractor IDs are in
21 yellow, so we can distinguish contractors
22 from employees. They are given access cards
23 to the areas they need to go to, and then our
24 role is to provide security and escort for

1 the nurses and/or the inmates so that proper
2 medical care can be given.

3 Q Do you know how they record their time?

4 A There is a time clock in the infirmary.

5 Q Do you know where they receive their
6 paychecks?

7 A I think its comes from CMS corporate
8 headquarters. I guess it's probably
9 St. Louis where they are based out of.

10 Q Do you know would determines a nurse
11 practitioner's daily schedule?

12 A The health service administrator.

13 Q Is that solely up to the health services
14 administrator?

15 A Well, yes, if the health service
16 administrator were to say we only want the
17 nurse practitioner to work on the midnight
18 shift and our staffing levels were so low
19 that it would be problematic to wake inmates
20 up and bring them down.

21 But absent that, the only hours that we
22 require are nursing hours. We want them to
23 coincide with our shifts. We want a certain
24 level of staffing, but as far as when the